

## Document Log Item

Addressing	
<b>From</b>	<b>To</b>
(b) (7)(C) /R9/USEPA/US	(b) (7)(C) /R9/USEPA/US@EPA (b) (7)(C) /R9/USEPA/US@EPA (b) (7)(C) /R9/ USEPA/US, (b) (7)(C) /R9/USEPA/US
<b>CC</b>	<b>BCC</b>
<b>Description</b> Form Used: Memo	
<b>Subject</b>	<b>Date/Time</b>
Draft response to HI CID	09/05/2012 08:36 AM
<b># of Attachments</b>	<b>Total Bytes</b>
0	5,161
<b>NPM</b>	<b>Contributor</b>
Processing	
<b>Comments</b>	

Body

## Document Body

please review this draft ..thanks

Aloha (b) (7)(C) -

I wanted to follow-up with you re the HDOH work at Hickam housing area we discussed when we were out in HI in the Spring. We had (b) (7)(C), one of our toxicologists, review the Hickam Communities remedial actions documents and he did find some problems. He had some initial conversations with HDOH and the State seemed reluctant to address our concerns so he elevated those concerns and after a call last week we have a path forward.

In short, the soils were well characterized using near surface soil sampling in 0-6 and 6-12 inch horizons in several efforts between 2004 and 2010. Soil residual above both Region 9 residential soil screening levels and HI DPH EALs were found and some of the highest concentrations on the surface addressed. There remains pesticide impacted soils on site and institutional land use controls intended to limit significant exposure, e.g. no dig controls for military housing, grass covered areas to limit direct contact with contaminated soils.

The largest deficiency is a clear demonstration of remaining surface pesticide impacted soils. In the Land Use Controls Inventory Document (LUCID) designed for the long-term management of the risk posed by the remaining pesticide impacted soils, there is a clear depiction of soils at depths deeper than 12 inches and under hard scape, i.e. existing foundation and roadways, that are assumed to contain residual pesticides but were not characterized. Sufficient controls appear to be in place to limit exposure for both residents and maintenance workers to these deeper soils. What the State has (in concept) agreed to add, is a clear map of residual concentrations that exist in the top 6 and 12 inch soil horizons that clearly demarcates where surface residual concentration exist. Since the lease on this property is for 50 years and military house is projected to occupy these sites for some time, if the levels of concern change, the questions of exposure will need to be revisited.

The State is going to share the revised management plan and LUCID with us after they meet with the RP and improve the maps. We also discussed the other components of their enforcement order which covers the tracking monitoring and Qtrly reporting of the implementation of the controls. They have said that they will conduct inspections and we have funded an audit program for managing sites with use controls which they will apply to this site. I intend to check in on this after some time to make sure they are following through. (b) will review the revised maps.

I did not get into the problems we had with the risk decision-making process but suffice it to say we would have applied risk assessment guidance differently at this site than HDOD. The larger problem the State faces is how to handle low level residual pesticides/termaticides in residential settings. There is potentially a significant volume of soils like this across the islands and really no "on-island" disposal capacity for off-site handling of these types of soils. So i can understand how they got to where they did

and why they felt it was appropriate to make some unconventional decisions in the risk assessment process. I am not sure I agree that they landed on the best solution but the solution they have is currently protective if it is vigorously implemented.

(b) (7)(C) [REDACTED], Assistant Director

Superfund Division

U.S. EPA Region IX

(b) (7)(C) [REDACTED]

(b) (7)(C) [REDACTED]

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Addressing	
<b>From</b>	<b>To</b>
(b) (7)(C) /R9/USEPA/US	(b) (7)(C) /R9/USEPA/US@EPA (b) (7)
	(b) (7)(C) /R9/USEPA/US
<b>CC</b>	<b>BCC</b>
(b) (7)(C) /R9/USEPA/US@EPA	
<b>Description</b> <span>Form Used: Reply</span>	
<b>Subject</b>	<b>Date/Time</b>
Re: Draft response to HI CID	09/05/2012 01:23 PM
<b># of Attachments</b>	<b>Total Bytes</b>
0	6,782
<b>NPM</b>	<b>Contributor</b>
<b>Processing</b>	
<b>Comments</b>	

Body

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Looks good. sp of termiticide.

(b) (7)(C) ---09/05/2012 08:36:30 AM---please review this draft ..thanks Aloha (b) (7)

From: (b) (7)(C) /R9/USEPA/US  
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